A.E. Staley Manufacturing Co.
Site Reconnaissance Summary
BVWST Project No.70540

On September 17, 1991, Tim Moody and John Quinn of BVWST conducted an SSI reconnaissance visit at this site. The weather was cloudy and pleasant. The visit began at 8:30 a.m. in a Staley conference room. Staley personnel present were Lauren W. Laabs, Environmental Science Manager; Edward E. Salch, Safety and Environmental Engineer; and Robert H. Marshall, Environmental Engineer. Richard Dickerson attended part of the initial office meeting. Dr. Hagenbach, the past director of Environmental Sciences and Safety, retired about five years ago.

The Staley personnel were surprised that this investigation is driven by the drum burial noted in the 1990 IEPA Preliminary Assessment (PA). They thought the drum issue was resolved with IEPA years ago. The Staley employees were unaware of the 1990 IEPA PA. IEPA investigator(s) were probably not on Staley property because locations of all landfill photos marked on a site sketch map were outside of the fencing around the plant.

The Staley representatives related the following information. Five hundred drums were stored outdoors on what is now an old asphalt parking lot with a gravel layer at the surface. The lot is surrounded by a six foot barbed wire fence and is now used as a parking area. Mr. Laabs is not certain, but the drums may have been in the northwest corner of the lot. The lot is located just northwest of the furthest western portion of a reservoir at the site. The site reservoir is now only for fire water. Old, black aeration pipes lie above it. Tall trees surround the reservoir and partially conceal it. The reservoir is contained by an earthen dam. In the gorge on the eastern side of the reservoir, called Hot Water Ditch, is a sampling station that continuously monitors drainage of non-contact cooling water.

The water flows from the Staley facility, beneath the reservoir, into the ditch, then south of Williams Street and eventually into Lake Decatur. The A.E. Staley representatives said fish are in the reservoir. An odor of smelled dead fish was noted by the sampling station. The entire Staley property is surrounded by a six foot barbed wire fence.

All 500 drums were first decanted. About 300 were steam-cleaned after decanting, then sent to a drum recycler. The remaining 200, containing some solid residue, were buried in one of two places that Mr. Laabs thinks were the last two open landfill locations before closure. These are both east-northeast of the sampling station that is at the eastern end of the reservoir and 100 to 200 yards north of Williams Street.

The landfill surface here is covered with vegetation. A tractor was mowing the healthy weeds on the landfill during the visit. No waste is exposed at the surface. A geophysical survey could possibly locate the drums. It is unknown whether other landfilled metal would interfere with a survey. These landfilled drums were probably not crushed during landfilling.

The landfill does not have a special clay liner. Slight topographic changes indicate cell locations. The eastern edge of the oldest landfill cell is near the eastern site boundary, near the boundary fence, with a residential community on the other side. The landfill area is fairly flat. There is little relief difference between the landfill surface and the rest of the extensive Staley property. Just south and east of the landfill, however, the elevation is lower. On the south side of the landfill area (100 feet north of Williams Street) is a 100 foot wide slope bulldozed bare of vegetation. They say there was erosion trouble here. A ditch full of rip-rap runs southeasterly from here. The ditch is dry. Material partially exposed by bulldozing includes concrete and asphalt pieces. The activity here was to try to re-contour to prevent erosion.

Richard Johnson of IEPA inspected the site November 15, 1985, and prepared a RCRA Inspection Report which describes the landfilling of wastes at the site. On March 28, 1986, IEPA sent Staley a Compliance Inquiry Letter (CIL) indicating apparent violations at the facility. Staley responded to the alleged violations. Two letters sent by IEPA to Staley, one dated August 25, 1986, the other dated December 31, 1986, informed Staley that two of the violations, regarding the drums, were resolved following review of Staley's response to them. The Staley personnel gave copies of the letters, as well as the CIL, RCRA Inspection Report Form B, and other correspondence, to the BVWST inspectors.

The Staley personnel believe the two letters from IEPA document the resolution of the drum issue, but according to the 1990 IEPA PA, potential ground-water and surface-water contamination may exist. Also according to the IEPA PA, the belief that materials in the buried drums are non-hazardous is questionable considering a list of chemicals provided by union members. Staley had layoffs in 1985-1986. Mr. Laabs pointed out that the chemicals were provided by union members during this period. They admitted that the chemicals provided by union members and listed in the IEPA PA are all wastes produced at the plant, but these wastes are dealt with properly.

Other characteristics at the site include a 10 foot tall berm that surrounds an inactive coal storage area, or pit. Coal still covers the bottom of the pit. A concrete manhole rising six feet above the ground and a three foot deep ditch with running water and frogs in it, are near the southeast corner of the site. The waterway goes under Williams Street, southeast of the landfill.

We concluded the visit at 11:45 am. After leaving the Staley premises, we drove around the residential areas east and south of the landfill. We believe the neighborhoods are on municipal water.